

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park Suite 6010 555 North Lane Conshohocken, Pa 19428

March 8, 1991

Russell G. Levering Bishop Tube Co. P.O. Box 1189 Frazer, Pa 19355

Re: Hazardous Waste Inspection PAD081868309 / 2-26-91 East Whiteland Township Chester County

#### NOTICE OF VIOLATION

Dear Mr. Levering:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

- 262.11 The facility did not utilize the TCLP method for the hazardous waste determinations for their various waste streams.
- 262.34 There were approximately 45 hazardous waste drums being stored on-site in excess of the 90 day storage limit. Also, there were 5 hazardous waste drums inside the plant which did not have a hazardous waste label affixed to them and did not have proper containment.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.



This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to ( contact me at (215) 832-6212.

Very truly yours,

Pal V. Pack Paul V. Panek

Waste Management Specialist

cc: Mr. Bonner

Compliance

U.S.EPA

Division of Compliance & Monitoring

#### Bureau of Waste Management

#### Hazardous Waste Inspection Report Generators — Part A

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			46 Vi	ialauga Observed 2-Not Applicable 3-Not Ostermised 4-No	e-Complisace
	e.	atus		REQUIREMENT	
1 1	.2	3	4		<del>                                     </del>
1		T	X		(b)
				Identification number	(c)(1)
1			†	Hazardous waste shipments offered only to licensed transporters	(c)(4)
+		X	$\top$	Authorization received from TSD facility for wastes shipped off-site	(d)
o		-	1	PA manifest used for intrastate shipments	(e)(2)
+	<del>, , ,</del> ,			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
+				Manifests filled out properly and completely	(e)(7)
1				Manifests routed properly and within time limits (7 days)	(e)(14
1				Proper U.S. DOT shipping containers or packages	(f)(1)(i
Ť		X		Shipping containers marked and labeled according to U.S. DOT	(f)(1)(i
T	$\neg$	X		Containers of 110 gal. or less marked with required PA label	(f)(1)(i
T	$\neg$	X		Placards offered to transporter	(f)(2)
T	一		Х	Wastes accumulated on-site for less than 90 days	(g)(1)(i
T			X	Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii
			X	Cantainers managed in accordance with 75.265(q)(1)—(9)	(g)(1)(ii
			X	Containers clearly marked with accumulation date and visible for inspection	(g)(1)(is
		X		Records retained at designated location for 20 years	(h)
		X		Quarterly reports submitted to the Department	(i)
	$\prod_{i}$	X	Ī	Exception reporting procedures followed	(i)
		Χ		Hazardous waste disposal plan, if required	0
	$\int$	Х		Spill reporting procedures followed	(m)(1)
	$\prod$		Ī	Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
Y	0			Special requirements followed for international shipments	(0)
X				On the job or classroom personnel training program (75.265(f))	(g)(1)(6)
			X	Orum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)
	1				

#### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### **Inspection Report Comments**

Date of Inspection February 26, 1991 Identification Number PAO	081868309
Company/Facility/Site Name Bishop Tube Co.	
Un February Qb 1991 I Along with Jim M Waste Management Specialist Trainers Conducted a Routing Above Referenced Facility. The following Violations were	iller & Pat Walters e inspection of the observed:
i) 262.11 - The facility lik not have Reterminations The TCLP Methop. This TCLP Methop Stould be applied Streams 4 the Analysis Should Remain on File.	Available atilizing & to All Waste
` <u> </u>	
2) 262.34 - The facility was storing approximately & drums over the 90 Day Storage limit. These Drums 5. disposed of AS Soon AS Possible.	's Anzoronus waste Hould be Properly
- There were 55 HADArosus waste drum	: insine It pl. +
which lid not Have the Proper Hozarous waste !	
Conditely filled out labels stould be applied in	nnediately. Also, to
5 DRUMS were being Storal in AREAS Which did	ust Hove PRUDER
Containment.	
In the "Requirement" Section of this inspection report, each listed inspection item may its corresponding obligation as described in the body of the regulations. Please use the Chapter tion report as a reference to obtain a detailed description of compliance requirements.  This inspection report is official notification that a representative of the Department of Env of Waste Management, inspected the above installation. The findings of this inspection are shotion report shall serve as a formal notification (Notice of Violation) of any violations which we tion. Violations may also be discovered upon examination of the results of laboratory analyses and Additional notification may be forthcoming, concerning any violations indicated herein and list This report does not constitute an order or other appealable action of the Department. Not deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not neccessarily imply concurrence with the fin acknowledge that the person was shown the report or that a copy was left with the person.	citations listed on this inspec- printer and the second of
Person Interviewed (signature) Mailed to facility	
Inspector (signature) Rel V. Parell	Date 3/7/91
	Page _ 3 of _ 3

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#### Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### Hazardous Waste Inspection Report Generators — Part A

Date of ins	spection <u>Jus</u>	<u>c 5, 1991</u>	Time_start	T	ime finish	
Name of in	spector $\frac{\Gamma_{\epsilon}}{\Gamma_{\epsilon}}$	aul V. Ponck				
Company, i	nstallation nam	10 Bistlap T	ube (v.			
		<i>I</i> .	FRAZES PO	•		
County	CHEST	ter	Munici	pality <u>Fait</u> (J	kitelana :	
			309			
Name of re	sponsible offici	ial Russell	G. Levering			
Title	Plant	Cogicler		· · · · · · · · · · · · · · · · · · ·		
Mailing add	ress	PO BUX	189 FRAZEC	Pa 19255		
Caa code a	and telephone r	number $(215)$	(.47 - 3450	<del></del>		
Name of pe	rson interviewe	ed Jame	a: above			
Title		<u> </u>	ja 12-	·		
Mailing add	ress <i>(if differen</i>	nt from above)	SAME AS AK	<i>ઇપદ-</i>		
Area code a	and telephone n	number				
		•				
	waste handling				- DDD	
a.	□ On-site	☐ treatment,	□ storage,	•		
b.	□ On-site	·	□ reuse,		☐ reclaim	
°C.	⊠ Off-site	_	storage,	ズ disposal		
$\bigcirc$ d.	® Off-site	use,	🗆 reuse,	□ recycle,	☐ reclaim	
2. Amount	of hazardous w	vaste produced:				
a			kg./m		•	
b	·····	<del></del>	kg./yr		,	
3 Types of	hazardous wa	usta produced by H	azardous Wasto Numb	or and destination fo	acility (include location and	tunol
Waste N			ination Facility	i and destination to	Location and Type	type,
14'		\				
K062			<u> </u>	:	<del></del>	
<u> </u>	3,40,19	5 Wast	E CONVERSION	<b>,</b>		
1002		<u></u>				
Foot		Mak				

#### Penantivade Deportant of Environmental Benearon Baress of Wests Monogramm

# Hazardous Wasto Inspection Report Generators — Part B

		1-1	ie Vie	lation Observed 2-Not Applicable 3-Rat Determined 4-Roe-Co	mplleeco
	Sta	itu <b>s</b>	·	REQUIREMENT	Chapter Citation
1	2	3	4		262
X				Hazardous waste determination, copies evallable	.11
$\times$				Identification number	.12(a)
X				Hazardous waste shipments offered only to licensed transporters	.12(d)
X				Authorization received from TSD facility for wastes shipped off-site	.13
X				PA manifest used for intrestate shipments	.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments	,20(c)
				Manifests filled out properly and completely	:29(g)
X	•			Menifests routed properly and within time limits (7 days) .23(c	,1,f,g,i)
ΧÌ				Proper U.S. DOT shipping containers or packages	.30(1)
Ì		X		Shipping containers marked and labeled according to U.S. DOT	.30(2)
χÌ				Containers of 110 gal. or lass marked with required PA label	.30(3)
		X		Plecards offered to transporter .	.33
× İ				Wostes eccumulated en-site for lass than 90 days	.34(1)
2				Wastes stored in proper containers and properly marked and labeled	.34(2)
				Containers managed in escordance with 265.171177 SES-Comments	.34(3)
X				Containers clearly marked with secumulation date and visible for inspection	.34(4)
X				Records retained at designated location for 20 years	.40
		$\times$		Quarterly reports submitted to the Department	.41
X				Exception reporting procedures followed	.42
		X		Hazzırdous waste disposal plan, if required	.45
		X		Spill reporting procedures followed	.46(a)
		X		Preparedness, Prevention and Centingency Plan and implemented 265.5154	34(a)(5), . <b>46(e)</b>
	X			Special requirements followed for international shipments	50.53.55.60
	X			On the job or classroom personnal training program 265.16	.34(a)(5)
		X		Orum accumulation area inspected weekly as per 265.174	.34(a)(3)
4				Manifests legible (all copies)	.23(h)
				Tanks managed in accordance with 265.190195	.34(a)(2
	_	X	_	Preparedness and Prevention as per 265.3137	.34(a)(5
		$\times$		Emergency Procedures as per 265 55- 56	.34(a)(5

# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

			1-N	o Violation Observed 2-Not Applicable 3-Not Determined 4-Non-C	Compliance
	Sta	itus		REQUIREMENT	Citation
1	2	3	4		40 CFR Part 268
				Generators	
X		_		Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
	Χ			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
X				Dilution not used as a substitute for treatment.	3
Κ				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6
				Storage Facilities	
	1			Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.	50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities	
	1			Dilution not used as a substitute for treatment.	3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)
	1			Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities	
				Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.	40
				Facility retains copies of generator notifications and certifications.	7(c)(1)

#### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Wasta Management

## Inspection Report Comments

Date of Inspection June 5, 1991	Identification Number _	PND 08/81	8309
Company/Facility/Site Name Bis Hap Tibe Co.			
- On June 5, 1991, 7 Conord	ted is fally -	y uspecti	er of the
pilon Attendocal Facility. There was	2 No Violativas	Ubasolish K	t the time
character : The frighty is	Corrently in CHA	stre 7 41	11 01
sut of the Equipment with the	AL PORLISES. T	us waste 1	NAS generated
in April + + + and + + 90-00	y Storage Limit,	the farility	SHOULD DISPORT
A this Motorial Ha Sour as	MARS This SH	pment	- HIGH OF IA
(1/ASTC: Conversion - 56 DMs (1/AKISO/ - 3000 gpl Four 4/9/9	4/8/91,5400 GAL	3/14/91 457	00 gall. 3/15/11
(17/FK)30/ - 3000 Gpl FSU1 1/9/9	I A I VIII'S FOO	7/ 1/71	/
		· · · · · · · · · · · · · · · · · · ·	
In the "Requirement" Section of this inspection report, et its corresponding obligation as described in the body of the regition report as a reference to obtain a detailed description of This inspection report is official notification that a represe of Waste Management, inspected the above installation. The fition report shall serve as a formal notification (Notice of Violation. Violations may also be discovered upon examination of the Additional notification may be forthcoming, concerning any with the thin the transfer of the server of the s	ulations. Please use the ( compliance requirements ntative of the Departmen indings of this inspection tion) of any violations wh results of laboratory analy iolations indicated herein le action of the Departme violation noted herein. y imply concurrence with	Chapter citations list.  It of Environmental are shown in this in this in this in the second second for the second listing any accept. Nothing contains the findings on the second listing and the second listing and the second listing contains the second listing	Resources, Bureau report. This inspec- I during the inspec- Department records. Iditional violations. ined herein shall be
Person Interviewed (signature) Many, Kocher	or Kithochild ( Ho	(Cays) Date	6/7/91
Inspector (signature) Fant Tanyl L	4: 5	Date	Page <u>4</u> of <u>4</u>

# Hazardous Waste Inspection Report TSD Facilities — Part A

Date	of insp	ection Nover	bar 5, 1991 Tin	ne start $\mathcal{X}$	2:45	Time finish	
Name	of ins	pector <u>Paul</u>	Y. Panek				
Comp	any, in	stallation name _	BisHOP Tube	Co.			
Locat	ion	Rt 30	+ Malin RD.	FRAZER			
Count	ty	CHESTER			<b>Municipality</b>	E, Whiteland	
ldenti	ification	number	20081868300				
Name	of res	ponsible official_	Russell G. L	evering			
Mailir	ng addr	ess <i>9.0</i> '	Box 1189 (	RAZER	Pa 19	355	
~							
			~ <b>~</b>				
Mailir	ng addr	ess <i>(if different f</i>	rom above)				
			nber				
1. Si	ite cha	racterization:					
	a.		☐ surface impound				□ biological —
	ь.	☐ Storage -			tanks	•	☐ waste piles
	C.	<b>™</b> Disposal	☐ land treatment .	🗆	landfill		☐ thermal treatment
	d.	☐ Use	□ reuse		recycle	☐ reclaim	
). D	oes the	facility generate	e hazardous wastes?	☐ Yes	□ No		
3. T	ypes of	hazardous wast	e produced by Hazar	dous Waste	Number:		
4. A	re haza	rdous wastes tra	ansported off-site by	the facility	? □ Yes	⊠ No	
				•		•	

## Department of Environmental Resources Bureau of Waste Management

### **Inspection Report Comments**

Date of Inspection November 5, 1991 Identification	Number PAD 0818 68309
Company/Facility/Site Name BisHof Tube Co.	
On November 5, 1991. I conoucted	A TOD inspection of the
Above References facility. The facility is one All Processes have CEASED. The facility is no	torrently under Chapter 14
All PROCESSES HAVE (ZASSED. THE TACHITY IS NO	OT OPERATING AS A 1320
:	
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· · · · · · · · · · · · · · · · · · ·	
· · · · · · · · · · · · · · · · · · ·	·
In the "Requirement" Section of this inspection report, each listed in	
its corresponding obligation as described in the body of the regulations. Pleation report as a reference to obtain a detailed description of compliance in This inspection report is official notification that a representative of the of Waste Management, inspected the above installation. The findings of this tion report shall serve a formal notification of any violations which were obtained by the discovered upon examination of the results of laboratory analyses and retion may be forthcoming, concerning any violations indicated herein and if the transfer of the transfer	equirements. Department of Environmental Resources, Bureau is inspection are shown in this report. This inspecserved during the inspection. Violations may also eview of Department records. Additional notificalisting any additional violations. he Department. Nothing contained herein shall be
Signature by the person interviewed does not necessarily imply concu- acknowledge that the person was shown the report or that a copy was k	rrence with the findings on this report, but does
Person Interviewed (signature)	Date 16/5/91
Inspector (signature) Fall. Fanel	Date

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#### Hazardous Waste Inspection Report Generators — Part A

<b>\</b>	73D
Date of inspection 11/19/91 Time start	Time finish
Name of inspector Paul v. Panek	
Company, installation name BisHop Tube Co.	
Location Rt 30 4 Malin RR. FRAZER	
County CH 33tea	Municipality & Whitelans
Identification number PAD 081868309	<del>ray and a second secon</del>
Name of responsible official ROSSEN G. LEYER	ing
Title Klast Engineer	·····
Mailing address Ps. Box 1/89 FRAZER	PA 19355
Area code and telephone number (215) 647 - 3	3450
Name of person interviewed Same as above	£
Title	
Mailing address (if different from above)	
Area code and telephone number	<u></u>
1. Current waste handling method:	
a. □ On-site □ treatment, □ storage	e, 🗆 disposal 🗆 PBR
b. $\square$ On-site $\square$ use, $\square$ reuse,	_ · <u>_</u>
c. ☎Off-site ☐ treatment, ☐ storage	
d. □ Off-site □ use, □ reuse,	
Amount of hazardous waste produced:	La tau
a b	
U	_ kg./yt.
3. Types of hazardous waste produced by Hazardous Waste Waste Number Destination Facility	Number and destination facility (include location and type).  Location and Type
•	<u> </u>

## Prescripturals Deportures of Environmental Resources Barrons of Weste Management $-\Delta E_{\rm Bol}$

#### Hazardous Waste Inspection Report Generators — Part B

		1-	No Vi	eletion Observed 2—Net Applicable 3—Net Determined 4	-Non-Compliance
	St	etus		REQUIREMENT	Chapter Citation
1	2	3	4		262
X				Hazardous waste determination, copies available	.11
X				Identification number	.12(8
×				Hazardous waste shipments offered only to Scensed transporters	,12(d
<i>.</i>		X		Authorization received from TSD facility for wastes shipped off-site	.13
N	·			PA menifest used for intrastate shipments	.20(b
	X.			Disposer state menifest or EPA formet manifest used for out-of-state shipments	.20(c
X				Manifests filled out properly and completely	:29(g
				Manifests routed properly and within time limits (7 days)	23(c,1,f,g;1).
Ť	×	×		Proper U.S. DOT shipping containers or packages	.30(1
1		<u>У</u>	$\vdash$	Shipping containers marked and labeled according to U.S. DOT	
+	_	X		Containers of 110 gal. or less marked with required PA label	.30(2
+				Plecards offered to transporter	.30(3
+	-	X		Wastes accumulated on-site for less than 90 days	.34(1
				Wastes stored in proper containers and properly marked and labeled	
7				Containers managed in accordance with 265.171177	.34(2
1	$\dashv$			Containers clearly marked with accumulation date and visible for inspection	.34(3
4		X		Records retained at designated location for 20 years	.40
+		$\frac{\wedge}{\chi}$	-	Quarterly reports submitted to the Department (Complete)	.41
+		X	$\dashv$	Exception reporting procedures followed	.42
十	-	$\frac{2}{x}$	-	Hezardous waste disposel plan, if required	
十	十	X	$\neg$	Spill reporting procedures followed	.45 .46(a)
+	_	اير	_	Preparedness, Prevention and Contingency Plan and Implemented 265.5154	34(a)(5) .46(e)
十、	2		$\dashv$	Special requirements followed for international shipments	50.53.55.6
<del></del>	2	_	7	On the job or classroom personnel training program 265.16	.34(a)(5
	$\widetilde{\omega}$	_	+	Drum accumulation area inspected weekly as per 265.174	.34(a)(3
7	' †		+	Manifests legible (all copies)	.23(h)
#	+	_	+	Tanks managed in accordance with 265.190195	.34(a)(2
+	7	x	_	Preparedness and Prevention as per 265.3137	.34(a)(5
T	-+	X	$\top$	Emergency Procedures as per 265.55-56	.34(a)(5

#### Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

			1-N/	o Violation Observed 2-Not Applicable 3-Not Determined 4-Non-Co	ompliance
	Stat	itus		DECUIDEMENT	Citation
1	2	3	4	REQUIREMENT	40 CFR Part 268
				Generators	
x				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
	×			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
X				Dilution not used as a substitute for treatment.	3
×				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)
				Storage Facilities	
	γ			Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)
	X			Containers marked to identify contents and accumulation date.	50(a)(2)
	Х			Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
	×			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a) (2)
	X			Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)
1				Treatment Facilities, including PBR and RRR Facilities	
	Х			Dilution not used as a substitute for treatment.	3
	χ			Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)
	۲			Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5) (b)(6)
				Land Disposal Facilities	
	X			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)
	X			Facility land disposes of restricted waste only if it meets applicable treatment standard.	40
	X			Facility retains copies of generator notifications and certifications.	7(c)(1)

#### Commonwealth or rennsylvania Department of Environmental Resources Bureau of Weste Management

## Inspection Report Comments

Date of Inspection	November	19, 1991	Identification Number _	PAD 0818 68309
Company/Facility/Site	Name <u>Bì</u>	off Tube C	<b>&gt;</b>	
the Above	RETERENCES	Facility. The	facility has cease	penerator Inspection of so operation to All Hasari of No water Remain
			plations observes.	
	•			
		·	· · · · ·	
	· .			
its corresponding tion report as a r This inspecti of Waste Manage tion report shall s be discovered up tion may be forth This report de deemed to grant Signature by	obligation as descri eference to obtain on report is official i ement, inspected the erve a formal notific on examination of to coming, concerning oes not constitute a or imply immunity the person intervie	ibed in the body of the la a detailed description of notification that a repre a above installation. The cation of any violations he results of laboratory g any violations indicat an order or other appeal from legal action for al wed does not necessal	regulations. Please use the of compliance requirements sentative of the Departmen e findings of this inspection which were observed during analyses and review of Detel herein and listing any addition of the Department violation noted herein.	t of Environmental Resources, Bureau are shown in this report. This inspec- ing the inspection. Violations may also partment records. Additional notifica- dditional violations. ent. Nothing contained herein shall be the findings on this report, but does
Person Interviewed (signsture)	gnature) <u>Mail 50</u> - Pale V.	TRUSTER (RICHARO Panel	Reeper EsQ)	Date
				/Page of

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